

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

THE CONNECTORS REALTY GROUP	)	
CORPORATION and DARRYL WILLIAMS,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 19-cv-00743
	)	
STATE FARM FIRE & CASUALTY	)	Judge Charles P. Kocoras
COMPANY,	)	
	)	Magistrate Judge Young B. Kim
Defendant.	)	
	)	

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**PLAINTIFFS' MOTION FOR LEAVE  
TO FILE SECOND AMENDED CLASS ACTION COMPLAINT**

NOW COMES, Plaintiffs, THE CONNECTORS REALTY GROUP CORPORATION and DARRYL WILLIAMS (collectively “Plaintiffs”), by and through their undersigned counsel, pursuant to Fed. R. Civ. P. 15, hereby move this Court for leave to file their Second Amended Class Action Complaint, and in support thereof, states as follows and incorporates its accompanying memorandum:

1. Plaintiffs bring this class action to seek redress on behalf of themselves and a putative class of State Farm Fire & Casualty Company’s (“State Farm”) customers residing in majority Black ZIP Codes in Illinois based on State Farm’s practices of improperly investigating and denying insurance claims based on criteria resulting in racial discrimination.
2. Plaintiffs now seek leave from the Court to file their Second Amended Complaint for two reasons.

3. First, Plaintiffs seek to clarify the allegations and causes of actions they are bringing to conform the pleadings to the discovery and to clarify that Count I—for violations of the Fair Housing Act, 42 U.S.C. § 3604(a) and (b)—seeks claims based on both disparate impact and disparate treatment.

4. Second, Plaintiffs seek to reinstate Antoine Nash as a party with a single count for violations of the Fair Housing Act based on the disparate impact claim following the additional analyses performed that relate specifically to State Farm rather than the original survey Plaintiffs referenced in the First Amended Complaint concerning the insurance industry as a whole. These additional analyses cure the insufficiency upon which the Court dismissed Nash's disparate impact claim pursuant to its Order dated October 9, 2019 (Dkt. 38).

5. Federal Rule of Civil Procedure 15(a)(2) provides that “a party may amend its pleading only with...the court’s leave,” and that the “court should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2).

6. When court approval is needed to amend a pleading, the court should freely give leave to amend when justice so requires. *Id.*; *Runnion ex rel Runnion v. Girl Scouts of Great Chicago and Northwest Indiana*, 786 F.3d 510, 519 (7th Cir. 2015). The liberal policy of granting amendments to complaints is based in part on the belief that decisions on the merits should be made whenever possible, absent countervailing considerations. *McDaniel v. Loyola Univ. Med. Ctr.*, 317 F.R.D. 72, 76 (N.D. Ill. 2016).

7. Accordingly, Plaintiffs submit a memorandum in support of this motion, including as exhibits, a copy of the proposed Second Amended Class Action Complaint with a redlined version showing the changes from the Amended Class Action Complaint (Corrected).

WHEREFORE, Plaintiffs respectfully request that the Court grant this motion and allow Plaintiffs to file their Second Amended Complaint as proposed, including adding Antoine Nash as a plaintiff.

Dated: February 5, 2023

Respectfully Submitted,

**THE CONNECTORS REALTY GROUP  
CORPORATION and DARRYL WILLIAMS**

By: /s/ Michelle M. LaGrotta

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**CERTIFICATE OF SERVICE**

I, Michelle M. LaGrotta, an attorney, hereby certify that on the 5th day of February 2023, I filed the foregoing ***Plaintiffs' Motion for Leave to File Second Amended Class Action Complaint*** through the Court's CM/ECF system, which will serve notice of filing on all counsel of record.

/s/ Michelle M. LaGrotta